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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

EDYTA GRYGLAK, formerly known as  
EDYTA A. FROMKIN,

Plaintiff,

vs.

HSBC BANK USA, N.A., as trustee for  
WELLS FARGO HOME EQUITY ASSET-  
BACKED CERTIFICATES, Series 2006-3,  
by its Attorney-in-fact WELLS FARGO  
BANK, N.A.; WELLS FARGO BANK,  
N.A.; and WELLS FARGO ASSET  
SECURITIES CORPORATION,

Defendants.

Case No.: 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
ON DEFENDANTS' RENEWED  
MOTION FOR SUMMARY JUDGMENT  
(FIRST REQUEST)**

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., and Wells Fargo Asset Securities Corporation (collectively, "Defendants" or "Wells Fargo") and Plaintiff Edyta Gryglak ("Plaintiff" and together with Defendants, the "Parties") hereby stipulate to extend by one week the time for Plaintiff to respond to for Defendants' Renewed Motion for Summary Judgment [ECF 151] (the "Renewed Summary Judgment Motion") from June 28, 2021 to July 6, 2021, and to set a briefing schedule for the Renewed Summary Judgment Motion and Ms. Gryglak's intended motion for summary judgment.

WHEREAS on May 28, 2021, Wells Fargo filed the Renewed Summary Judgment Motion pursuant to the May 24, 2021 Stipulation and Order [ECF 150], which granted Wells Fargo's Motion to Reopen the Dispositive Motion Deadline;

WHEREAS the May 24, 2021 Stipulation and Order provided that “Ms. Gryglak shall have 30 days from the date that Wells Fargo files its renewed summary judgment motion to (1) file an opposition to that motion and (2) file her own optional summary judgment motion regarding her theory of contract damages, only” (the “Gryglak Summary Judgment Motion”);

WHEREAS Ms. Gryglak has decided to file the Gryglak Summary Judgment Motion and requires an additional week to complete that motion and her papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion;

WHEREAS Wells Fargo requires 30 days to file papers in opposition to the Gryglak Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment Motion; and

WHEREAS Wells Fargo and Ms. Gryglak believe that a unified briefing scheduling for both summary judgment motions is appropriate;

**THE PARTIES HEREBY STIPULATE:**

1. Ms. Gryglak’s due date to file the Gryglak Summary Judgment Motion and her papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion is extended by one week, from June 28, 2021 to July 6, 2021.

2. The remainder of the briefing schedule for Wells Fargo’s Renewed Summary Judgment Motion and the Gryglak Summary Judgment Motion shall be:

- (i) On August 6, 2021, Wells Fargo shall file papers in opposition to the Gryglak Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment Motion;
- (ii) On August 20, 2021, Ms. Gryglak shall file reply papers in further support of the Gryglak Summary Judgment Motion.

Dated: June 28, 2021

Dated: June 28, 2021

SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

*/s/ Blakeley E. Griffith*

*/s/ Edward Griffith*

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*Attorneys for Defendants*

*Attorney for Plaintiff*

**ORDER**

**IT IS HEREBY ORDERED** that the due date for Ms. Gryglak to file her summary judgment motion regarding her theory of contract damages, only (the “Gryglak Summary Judgment Motion”) and her papers in opposition to Wells Fargo’s Renewed Motion for Summary Judgment is extended by one week, from June 28, 2021 to July 6, 2021.

**IT IS HEREBY FURTHER ORDERED** that the remainder of the briefing schedule for Wells Fargo’s Renewed Motion for Summary Judgment and the Gryglak Summary Judgment Motion shall be:

- (i) On August 6, 2021, Wells Fargo shall file papers in opposition to the Gryglak Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment Motion;
- (ii) On August 20, 2021, Ms. Gryglak shall file reply papers in further support of the Gryglak Summary Judgment Motion.

**IT IS SO ORDERED.**

DATED July 1, 2021.

  
U.S. DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2021, I electronically filed the foregoing **STIPULATION** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 28<sup>th</sup> day of June 2021.

*/s/ Edward Griffith*

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EDWARD GRIFFITH, ESQ